RECEIVED

Revised 09/03

ACTION

CORRES. CONTROL INCOMING LTR NO.

OO934 RF O3

DUE DATE

2003 OCT -8 A 10: 05 Department of Energy

CORRESPONDENCE ROCKY FLATS FIELD OFFICE CONTROL 10808 HIGHWAY 93, UNIT A GOLDEN, COLORADO 80403-8200

OCT 0 6 2003

03-DOE-01381

DIST.	LTR	ENC
BERARDINI, J. H.	X	
BOGNAR, E. S.	1	10
BROOKS, L.	⋘	1
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BUTLER, L. CROCKETT, G. A.	+	┯-
	10	 -
DECK, C. A.	₩	 _ _
DEGENHART, K. R.	12	X
DIETER, T. J.	1	
DIETERLE, S. E.	 	
FERRERA D. W.	 	_
GIACOMINI, J. J.	ļ.,	<u></u>
HIETT, S. B.	X	\boldsymbol{X}
ISOM, J. H.	L	
LINDSAY, D. C.	\mathbf{x}	LX
LONG, J. W.	I	
LYLE, J. L.	<u> </u>	
MARTINEZ, L. A.	X	\mathbf{x}
NAGEL, R. E.	IX	\square
NORTH, K.	1X	TX
PARKER, A. M.	X	\mathbf{x}
RODGERS, A. D.	1	
SHELTON, D. C.	X	X
SPEARS, M. S.	-	
TRICE, K. D.		_
TUOR, N. R.	X	X
WILLIAMS, J. L.	_	~
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Mr. Steven H. Gunderson Rocky Flats Cleanup Agreement Project Coordinator Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, Colorado 80246-1530

Dear Mr. Gunderson:

Please find enclosed a completed Rocky Flats Cleanup Agreement (RERA) Standard Operating Protocol (RSOP) for Component Removal, Size Reduction, and Decontamination Notification Form for Buildings 991 and 884 Component Removal for RCRA Units 991.1 and 984.1.

In accordance with the Component Removal RSOP, this letter and its enclosure are notification for RSOP implementation. This notification is for all activities required in Building 984 to provide for RCRA unit closure of the above listed units. The RSOP work under this notification will achieve the closure standard, protect human health and the environment, and minimize waste.

The requirements, methods, controls and processes outlined in the RSOP have been included in the scope of work for the contract. If the subcontractor would like to use a method or process not included in the RSOP, then the subcontractor is required to notify the prime contractor and an additional RSOP notification will be initiated and a decision document modification pursued.

The subcontractor will conduct work in accordance with his work control documentation. The exact methods and process selection will be communicated with the Colorado Department of Public Health and Environment through an active consultation process including monthly RISS Production Meetings and weekly project meetings. The building shell, including the floor, will not be breached during component removal activities. Questions may be directed to Steve Tower at (303) 966-2133.

Reviewed for Addressee Corres. Control RFP

COR. CONTROL

10/8/03 Ac Date By

Ref. Ltr. #

DOE ORDER#

Enclosure

Joseph A. Legare

Sincerely,

Assistant Manager for Environment and Stewardship

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RECEIVE OF

DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIF'C, T'ON OFFICE ADMIN RECORT IA-A-001670

19

cc w/o Encl.:

E. Schmitt, OOM, RFFO

S. Tower, AMP, RFFO

F. Gibbs, K-H RISS D&D

K. Wiemelt, K-H RISS D&D

S. Nesta, K-H RISS Env.

T. Rehder, USEPA

cc w/Encl.:

Administrative Record

RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist Page 1 of 5

Project scope:		igs 991and 993 191.1 and 984.		ent removal, de:	contamina	ition, siz	e redi	uction	, and R	CRA	closure of
Facility descript	ion:	Buildings 99 Waste Storag	•	erial Receiving	and Ship	oing), 9	98 (St	orage	vault)	and 9	84 (TRU
Description of pl	anned	activity(ies):		components, or B of B991 pri							
Facility/rooms/se	ts/area	s involved:	All areas	of Buildings 9	01, 998 ar	d 984					
Is RCRA unit cl								1 (B9	84)	~	Yes No
Attach checklist	from /	Appendix A o	f the RSO	P.	~	Component Removal/Size Reduction					
					~	Deco	etami	nstio	13		
RLCR Status	-	RLCR com	plete and	concurrence n	ecelved: (3/21/03)				
		RLCR initi	ated but i	ncomplete; con	CALLERCE	anticiç	nated:				
		RLC has no	ot been in	itiated ¹ and is :	cheduled	for ini	tiatio	on:			
If RLCR is not c											
Activity requires	requires modification to the ARARs listed in the RSOP. Yes, attach to					to letter					
							_	~	No		
Attach Administ											
Point of contact	for each	facility/activ	rity: Ka	ren Wiemelt -	(303) 966	5-9883					
Duration of wor	k activi	ties: 2 mont	ths		Anticipa	ted wor	k sta	rt:	0/01/0)3	
Attach schedule	for cac	h facility or a	ctivity for	information p	шрозез.						
Does the activity shell.	involve	removing co	ntaminat	ed portions of	he buildi	ng					Itation required
							~	No			

Evaluate using DPP, Sections 1.1.4 and 1.1.5 and the consultative process to implement activities

RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

Are there deviations/exceptions to the R	RSOP (or the pro	posed	l activity(ies)	?		Yes
							✓ No
Provide an explanation of deviation/exc C. Check the appropriate resulting act	•		OP:	Not applica	ble		
Additional RFCA decision docum	nent re	quired (P	AM -	IM/IRA)			
Major modification to RSOP				Field cha	nge to	RSOP	
Minor modification to RSOP				LRA con	sultat	ion	
Activity(ies) will result in the following	waste t	ypes					Process waste
•						4	Remediation waste
TRU V LLW LLMW	V .	Haz	~	Sanitary	¥	Othe	r: recyclable/re-use
LRA Notification Review Time		14 days,	no R	CRA unit ele	sure	involve	d
	>	30 days,	RCR	A unit closu	re inv	olved	

FACILITY COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION ACTIVITY CHECKLIST

Building: <u>Buildings 991</u>	and 998
Closure Project Manager:	Karen Wiemelt

COMPONENT REMOVAL/SIZE REDUCTION

Component West	12
Gloveboxes	
Tanks and ancillary equipment (located both inside and outside the facility)	~
Fume hoods	v
Ventilation/filtration systems (both inside and outside the facility)	~
Utilities and other equipment (both inside and outside the facility; including electrical, steam, and fire suppression systems)	~
Walls	>
Floors	¥
Ceilings	~
Roofs	
Other structural members	
Other*	

Removal/Size Reduction Rechniques	**
Small tools	>
Paving breaker, jackhammer and/or similar tools used to break up concrete	
Excavators, such as backhoes, to excavate underground components, such as tanks and ancillary equipment	
Hoists and cranes	
Plasma are cutter	
Diamond wire saw	
Wachs cutter	
Laser cutter	
Oxy-torch cutter	
Hydraulic shears	
Shear baier	
Water cutter using abrasives	
Are air slice	
Arbor press	
Non-explosive cracking agent	
Other *	

* Describe "Other" Component	Type(s) and/or Removal/Size Reduction Technique(s):

DECONTAMINATION

Componentity ice	100
Gloveboxes	
Tanks and ancillary equipment (located both inside and outside the facility)	~
Fume hoods	~
Ventilation/filtration systems (both inside and outside the facility)	>
Utilities and other equipment (both inside and outside the facility; including electrical, steam, and fire suppression systems)	>
Walls	
Floors	>
Ceilings	
Roofs	
Other structural members	
Other*	

Decontamination Technique	
Wiping/scrubbing/washing with water or detergents	~
Vacuuming	~
Strippable Coating	~
Grinding	
Scarifying	
Scabbling	
Paving breaker/chipping hammer	
Spalling	
Abrasive/grit blasting	
CO ₂ blasting	
Hydrolasing	
Strong mineral acids	
Organic or weak acids	
Additional oxidants, such as cerium and other similar metals	
Other *	v

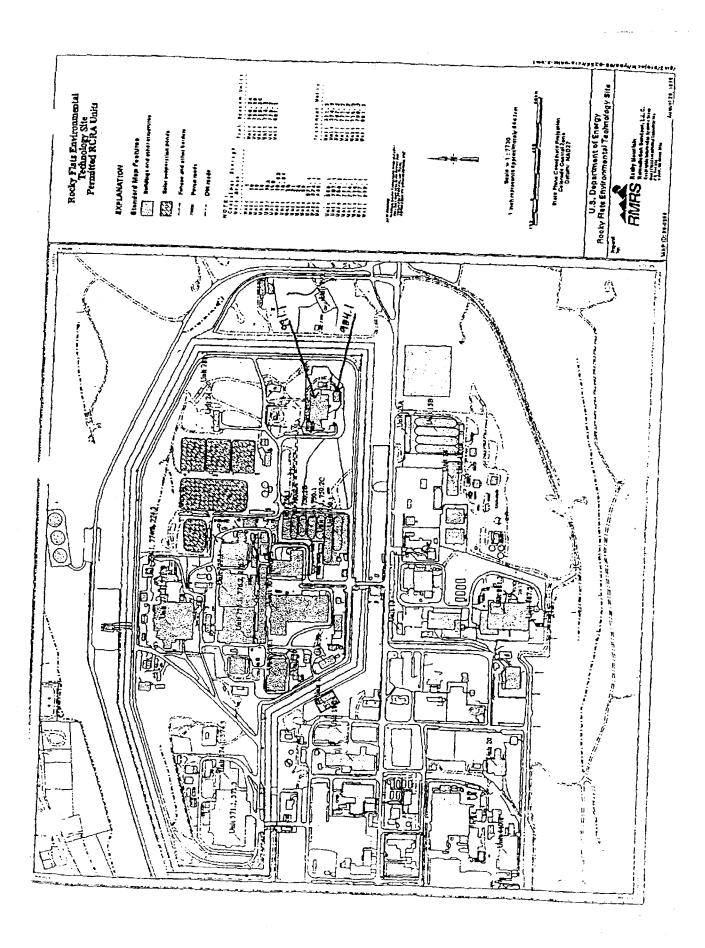
* Describe "Other" Component(s) and/or Decontamination Technique(s):
The rad contamination in Corridor B is in the paint. This paint may be removed by chipping
with small tools

Note: In the event a planned activity falls outside the scope of this RSOP, the closure project manager will consult with DOE and the LRA to determine whether this RSOP should be modified to include the activity, or whether a separate decision document should be written.



Administrative Record Requirements for this Activity

- Final Rocky Flats Cleanup Agreement (RFCA)
- RFETS Decommissioning Program Plan (DPP)
- RFCA Standard Operating Protocol for Component Removal, Size Reduction, and Decontamination Activities
- Reconnaissance Level Characterization Report for Group Area 2 Group 2 Facilities
- Notification Letter and subsequent CDPHE correspondence, if appropriate



Attachment 3 FEG-026-03 Page 1 of 5

Closure Description Document for RCRA Units 991.1 and 984.1 Revision 0, 09/04/03

Closure Description Document for the
Closure of RCRA Units 991.1
The Mixed Waste Storage Unit at Building 991, and 984.1 The
TRU Waste Storage Facility at Building 984

INTRODUCTION

The Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Section 5.0, Revision 0, February 4, 2001" addresses closure of RCRA regulated units.

This document applies to RCRA Units 991.1 and 984.1. Unit 991.1 includes numerous hazardous and mixed waste storage rooms located in Buildings 991 and 998. Unit 984.1 refers to the Transuranic (TRU) Waste Storage Facility at Building 984. Complete closure will be accomplished in accordance with Option 1 of the closure options outlined in the RSOP (Sections 5.1.1 – 5.1.3).

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to the start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

SYSTEM HISTORY AND WASTE CHARACTERIZATION

RCRA Unit 991.1 within the 991 and 998 facilities is located near the eastern edge of the RFETS industrial area. The past history within these facilities included final assembly areas for plutonium, enriched uranium, depleted uranium and beryllium weapons components. These components were stored within the 991 facility cluster prior to offsite shipment. Unit 991.1 is a relatively new permitted waste storage unit. The first drum of waste to be stored in the unit was placed there on September 6, 2000. Since then, the facility has served as a TRU waste storage facility. The EPA hazardous waste codes that apply to Unit 991.1 include D001 - D011, D018 - D019, D022, D028 - D029, D034 - D035, D038 - D040, D043, F001-F003, F005 - F009. See Attachment 1, Unit Specific Information - Unit 991.1, from the RFETS RCRA permit.

The permitted storage capacity (maximum) of Unit 991.1 is 50,655 gallons. Liquids are permitted to a 973 gallon maximum.

RCRA Unit 984.1 within Building 984 is also located near the eastern edge of the RFETS industrial area, adjacent to B991. This unit was put into service in September 2000, and inactivated in May 2003. The EPA hazardous waste codes that apply to Unit 984.1 include D001 - D011, D018 - D019, D022, D028 - D029, D034 - D035, D038 - D040, D043, F001-F003, F005 - F009. See Attachment 2, Unit Specific Information—Unit 984.1, from the RFETS RCRA permit.

The permitted storage capacity (maximum) of Unit 984.1 is 217,604 gallons. Liquids are permitted to a 330 gallon maximum.

System Boundaries

Unit 991.1 is specific to the following Rooms within Building 991: 101, 105, 106, 107, 108, 110, 110A, 110B, 111, 111A, 112, 113, 114, 115, 116, 118, 119, 120, 122, 122A,

10

122B, 123, 124, 127, 128, 129, 132, 134, 135, 136, 137, 138, 140, 140A, 141, 142, 142A, 142B, 143, 147, 147A, 148, 149, 150, 151, 153, 155, 156, 157, 158, 166, 167 and 170, and within Building 998: Room 300 and Corridor A. See Attachment 1, Unit Specific Information – Unit 991.1, from the RFETS RCRA permit.

Unit 984.1 is specific to the interior of B984. See Attachment 2, Unit Specific Information – Unit 984.1, from the RFETS RCRA permit.

CLOSURE OPTIONS

Units 991.1 and 984.1 - All Permitted Waste Storage Rooms in Buildings 991, 998, and 984

A review of the RCRA Operating Record including weekly inspection logs, ECATS, PATS, and the Spill Occurrence Report, indicates that no hazardous, TRU or TRU-mixed waste has spilled, leaked or otherwise been released from Units 991.1 or 984.1. A visual inspection of the permitted storage rooms by RISS Environmental compliance personnel verified the absence of hazardous or mixed waste stains and/or residuals. The observed stains in 991.1 can be attributed to rain/snow melt. Additionally, there is no record of liquid wastes being stored in Unit 984.1. Therefore, Units 991.1 and 984.1 will be closed in accordance with Section 5.1.1 of the "RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities", Option 1. Option 1 requires that two criteria be met, a review of the Operating record to document spills or releases were adequately cleaned up, and a visual inspection to verify the absence of stains and/or residuals.

SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

The Historical Release Report indicates that soil contamination may exist underneath B991 as detailed in the Under Building Contamination (UBC) 991 description. Soil sampling is not planned for activities conducted under this RSOP notification. ER will perform any necessary soil sampling and associated soil remediation upon invoking the ER RSOP for Routine Soil Remediation.

RECORDKEEPING

RCRA unit closure activities will be documented in the Decommissioning Final Closeout Report as opposed to the Pre-Demolition Survey Report (PDSR) which will be completed after demolition of the units. When final closure of units 991.1 and 984.1 are completed, the Site's Master List of RCRA units will be updated with the closure status and a permit modification will be submitted to remove the units from the RCRA Part A and Part B Permit. All inspection records will be sent to permanent storage.

Closure Description Document for RCRA Units 991.1 and 984.1 Revision 0, 09/04/03

ATTACHMENT 1 Unit Specific Information Unit 991.1

Unit Number:

Unit Name:

Process Code: Design Capacity:

Waste Type(s):

Process Total Number of Units:

EPA Hazardous Waste Codes:

991.1

Container Staging and Storage Area (Building 991)

Maximum Capacity: 50,655 gallons Liquid Capacity Limit: 973 gallons

TRU Mixed

D001-D011, D018-D019, D022, D028-D029, D034-035, D038-D040,

D043, F001-F003, F005-F009

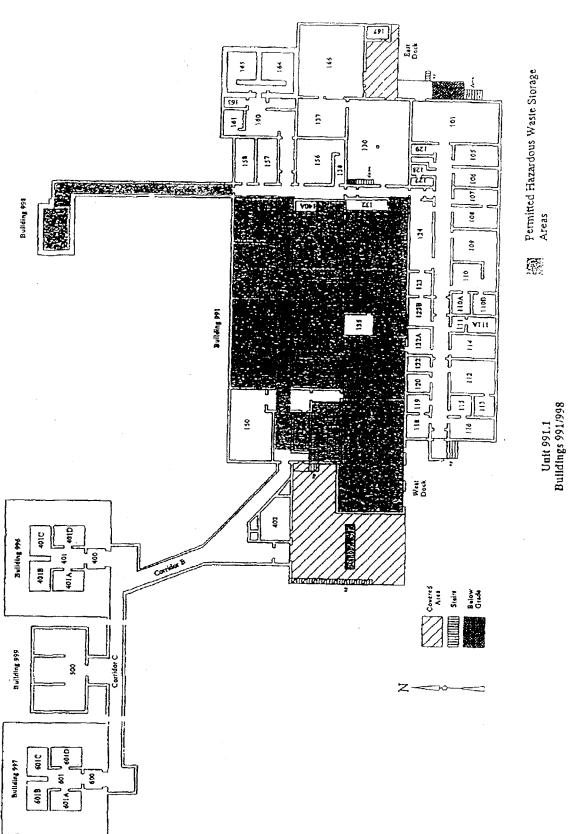
Estimated Annual Quantity of Waste:

RCRA Part A Application, Rev. 98-1

Unit Permitting

500 Tons





111-30

February 28, 2003

hailable Copy

Closure Description Document for RCRA Units 991.1 and 984.1 Revision 0, 09/04/03

ATTACHMENT 2 Unit Specific Information Unit 984.1

Unit Number:

Unit Name:

Process Code:

Design Capacity:

Waste Type(s):

Process Total Number of Units:

EPA Hazardous Waste Codes:

Estimated Annual Quantity of Waste:

Unit Permitting Status:

984.1

Container Staging and Storage Area (Building 984)

Maximum Capacity: 217,604 gallons (1,077 cubic yards)

Liquid Capacity Limit: 330 gallons

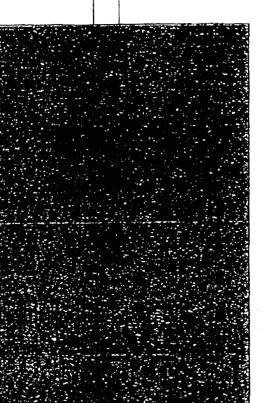
Low-Level Mixed, TRU Mixed

D001-D011, D018-D019, D022, D028-D029, D034-D035, D038-

D040, D043, F001-F003, F005-F009

3,800 Tons

Permitted



Permitted Hazardous/Mixed Waste

Unit MS 001, Sub-Unit 984.1 Building 984

111-29

Administrative Record Requirements for this Activity

- Final Rocky Flats Cleanup Agreement (RFCA)
- RFETS Decommissioning Program Plan (DPP)
- RFCA Standard Operating Protocol for Component Removal, Size Reduction, and Decontamination Activities
- Reconnaissance Level Characterization Report for Group Area 2 Group 2 Facilities
- Notification Letter and subsequent CDPHE correspondence, if appropriate



